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June 17, 2024

*Via ECF*

Honorable Thomas I. Vanaskie, Special Master  
Stevens & Lee, P.C.  
1500 Market Street, East Tower, 18th Floor  
Philadelphia, Pennsylvania 19103

Re: *In re Valsartan, Losartan, and Irbesartan Products Liability Litigation*,  
No. 1:19-md-02875-RBK (D.N.J.)

Dear Judge Vanaskie:

Please accept this letter on behalf of the Plaintiffs addressing the issues to be discussed during the June 21, 2024, status conference regarding Losartan and Irbesartan.

### **1. Discovery Deadlines for Losartan and Irbesartan Discovery From Manufacturers.**

The Plaintiffs and the API and finished dose manufacturer Defendants negotiated search terms, custodian lists, and other issues as to the scope of custodial and non-custodial document production related to losartan and irbesartan in July and

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August of 2023, and Plaintiffs served their 30(b)(6) deposition notices on May 22, 2023. The manufacturer defendants began rolling productions of losartan and irbesartan documents in the fall of 2023. The productions are not complete.

Plaintiffs request the following deadlines with regard to the API and finished dose manufacturer defendants:

**June 30, 2024:** Defendants to (1) complete any outstanding document productions, and (2) provide the identity, topics to be covered, and available dates, for their 30(b)(6) witnesses.

**September 30, 2024:** Deadline to complete depositions of Defendants' 30(b)(6) and fact witnesses.

## **2. Losartan and Irbesartan Structured Data from Retailer Defendants.**

Consistent with the Court's earlier valsartan orders, counsel for Plaintiffs and Retail Pharmacy Defendants met and conferred to identify the losartan and irbesartan structured data that would be provided to Plaintiffs and what events would trigger a requirement of Retailer Pharmacy Defendants to produce the Protected Health Information ("PHI") associated with the data to satisfy such orders. The parties are working on a PHI order which we will submit to the Your Honor once finalized.

Respectfully,



Adam M. Slater, Plaintiffs' Liaison Counsel

Cc: Counsel of record (via ECF)